

THE LAW OFFICES OF SEAN M. MAHER, PLLC

January 30, 2017

VIA ECF and FAX (212) 805-7986

Honorable Paul G. Gardephe
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007-1312

RE: *United States v. Maalik Jones*, 16 Cr. 00019 (PGG)

Dear Judge Gardephe:

I respectfully write to request that the current motions schedule set by the Court be rescheduled by pushing all deadlines back by two weeks. Defense motions currently are due on January 31, 2017; the government's opposition is due February 14, 2017, and any defense reply is due February 24, 2017. I am requesting that defense motions be due February 14, 2017; the government's opposition be due February 28, 2017; and any defense reply be due by March 10, 2017.

The reason for this request is that the parties are in advanced stages of negotiating a resolution to this matter and a brief delay in initiating another round of litigation would serve the interests of all the parties. The extra time is also needed by the defense to complete its motions should the parties be unable to reach a resolution in the brief time period that has been requested.

I have relayed the instant request to the government and AUSA Andrew DeFilippis has informed me that the government does not object to the defense's request to reschedule the motions deadlines.

Respectfully submitted,

/S/
Sean M. Maher
Counsel for Maalik Jones

cc: Opposing counsel via ECF